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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, ) CASE NO. 20-CR-00249 RS  
14 Plaintiff, )  
15 v. ) STIPULATION AND [PROPOSED] ORDER  
16 ROWLAND MARCUS ANDRADE, ) CONTINUING STATUS CONFERENCE  
17 Defendant. )  
18 \_\_\_\_\_)

19  
20 The defendant Rowland Marcus Andrade appeared before this Court on July 28, 2020 for a  
21 Status Conference, and at that hearing the Court set a further Status Conference for October 27, 2020.  
22 The parties jointly request that the Status Conference be continued until January 5, 2021, or a date  
23 thereafter convenient for the Court, and that time be excluded from the Speedy Trial Act.

24 Since the Status Conference, the parties have negotiated a stipulated form of protective order,  
25 and the Court entered the Protective Order on October 15, 2020. The government will begin providing  
26 discovery pursuant to that protective order in the next few days, and will continue providing discovery  
27 as it is available. The discovery in the case is voluminous, and the parties request the continuance in  
28 order to provide the defense with the opportunity to continue to review these discovery materials.

The parties also request that the Court exclude time from the Speedy Trial Act deadlines on the basis that the proposed continuance will allow effective preparation of counsel. The parties agree that the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties further agree that the failure to grant this continuance would unreasonably deny counsel for defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Accordingly, the parties agree that the period from October 27, 2020 through January 5, 2021, or the date of the continued Status Conference, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into account the exercise of due diligence.

## IT IS SO STIPULATED,

DATED: October 23, 2020

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s/  
**LLOYD FARNHAM**  
Assistant United States Attorney

## ZUBER LAWLER & DEL DUCA LLP

/s/  
**BRIAN J. BECK**  
Attorney for Defendant

## [PROPOSED] ORDER

For the reasons stated in the stipulation of the parties above, and for good cause shown, the Court hereby orders that the Status Conference currently set for October 27, 2020 is vacated and reset for January 5, 2021, at 2:30 p.m. It is further ordered that time is excluded, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) through January 5, 2021.

DATED:

**HONORABLE RICHARD SEEBORG**  
United States District Judge